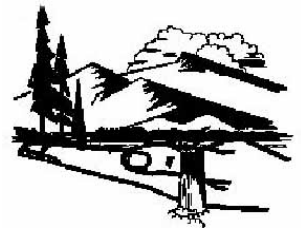




# Department of Environmental Quality

*To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.*



Mark Gordon, Governor

Todd Parfitt, Director

July 6, 2022

Ms. Monica Morales  
Acting Director  
Air and Radiation Division  
EPA Region 8  
1595 Wynkoop St.  
Denver, CO 80202

## **Re: Initial Notification of Air Quality Division 2020 Ozone Wildfire Exceptional Events**

Dear Ms. Morales,

Attached is an initial notification of a wildfire smoke exceptional event that occurred in the western regions of the United States during the time frame of August 21, 2020 through August 24, 2020 that led to several exceedances of the 8-hour 2015 Ozone National Ambient Air Quality Standard (NAAQS). While the wildfire smoke plume was regional in nature and was observable throughout the state during the event, it did not cause all monitors to exceed the Ozone NAAQS throughout the event. Smoke from the wildfires in California and Colorado impacted and resulted in twenty-three (23) recorded exceedances of the United States Environmental Protection Agency's (US-EPA) 8-hour Ozone NAAQS. The Wyoming Department of Environmental Quality – Air Quality Division (WDEQ-AQD) has evaluated the initial notification and circumstances surrounding the event and represents that the event should be evaluated by the US-EPA Region 8 as a wildfire exceptional event.

WDEQ-AQD is submitting an "Initial Notification of Potential Exceptional Event" and flagging the data in EPA's Air Quality System (AQS) as per 40 CFR §50.14(c) (2) (i) as a result of elevated Ozone concentrations. The WDEQ-AQD requests that the Administrator determines that this event meets the provisions outlined in 40 CFR 50.14 (a) (1) (F) as a regulatory determination made on a case-by-case basis. The WDEQ-AQD considers this event to be of regulatory significance because of the WDEQ-AQD's reliance on ambient data to determine compliance with the NAAQS at state run State and Local Air Monitoring Stations (SLAMS) and Special Purpose Monitors (SPM). Additionally, these data are used in WDEQ-AQD's permitting process as well as by the US-EPA and third party interests in evaluating Wyoming's air quality. These reasons demonstrate the need to accurately portray anthropogenic versus non-anthropogenic or "exceptional" air quality issues to the public by means of excluding exceptional event concurred data from the data record.

It is also the WDEQ-AQD's stance that any exceedance caused by an exceptional event is significant and that it is important to demonstrate to the public the difference between exceedances that are anthropogenic versus those that are non-anthropogenic or exceptional in nature. Properly characterizing these exceedances in the public record and providing scientific evidence supporting the claim of exceptionality is essential to our shared role of serving the public. These data are used by the public, researchers, and other agencies to make scientific, public health, and policy decisions. These data must be properly flagged and concurred with in the US-EPA's AQS in order for those data to be handled correctly and reflect the monitor design values. Without the critical step of determining concurrence, data is often misused by these entities to support decisions that may have consequences on a local or national level. Additionally, the numerous exceedances of the 8-hour Ozone NAAQS will affect future years design values, with the potential of a NAAQS violation.

Due to the above mentioned factors, the WDEQ-AQD considers these exceedances to meet the criteria of regulatory significance and requests that the Administrator make a determination under 40 CFR 50.14 (a) (1) (F) that the US-EPA will agree to review an Exceptional Event demonstration for this event.

Please contact Darla J. Potter, AQRM Program Manager, with questions at 307-777-7380.

Sincerely,



Darla J. Potter  
Air Quality Resource Program Manager  
Air Quality Division

Cc: Mark R. Gagen, Air Pollution Monitoring Program Manager, AQD

## EE Initial Notification Summary Information

## Ozone Exceedance

Submitting Agency: State of Wyoming – Air Quality Division

Agency Contact: Darla Potter

Date Submitted: 7/6/2022

Applicable NAAQS: 2015 ozone – 8-hour 0.070 ppm

Affected Regulatory Decision<sup>1</sup>: F) Case by case basis – see cover letter

*(for classification decisions, specify level of the classification with/without EE concurrence)*

Area Name/Designation Status: Attainment/ Unclassifiable

Design Value Period (list three year period): 2018-2020

(where there are multiple relevant design value periods, summarize separately)

### **A) Information specific to each flagged monitor day that may be submitted to EPA in support of the affected regulatory decision listed above**

Date of Event	Type of Event (high wind, volcano, wildfires/prescribed fire, other <sup>2</sup> )	AQS Flag	Monitor AQS ID (and POC)	Monitor Name	Exceedance Concentration (ppm)	Notes (e.g. event name, links to other events)
8/21/2020	Wildfire	IT	56-035-0700 POC-1	Big Piney	0.073	Wildfire Exceptional Event Demonstration August 2020
8/21/2020	Wildfire	IT	56-009-0010 POC-1	Converse County	0.075	Wildfire Exceptional Event Demonstration August 2020
8/21/2020	Wildfire	IT	56-037-0023 POC-1	James Town Mobile	0.074	Wildfire Exceptional Event Demonstration August 2020
8/21/2020	Wildfire	IT	56-037-0300 POC-1	Moxa Arch	0.073	Wildfire Exceptional Event Demonstration August 2020
8/21/2020	Wildfire	IT	56-041-0101 POC-1	Murphy Ridge	0.077	Wildfire Exceptional Event Demonstration August 2020

8/21/2020	Wildfire	IT	56-013-0099 POC-1	South Pass	0.072	Wildfire Exceptional Event Demonstration August 2020
8/21/2020	Wildfire	IT	56-005-0123 POC-1	Thunder Basin	0.071	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-035-0700 POC-1	Big Piney	0.073	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-035-0099 POC-1	Boulder	0.074	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-025-0100 POC-1	Casper Gaseous	0.076	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-009-0010 POC-1	Converse County	0.074	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-035-0100 POC-1	Daniel South	0.076	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-037-0077 POC-1	Hiawatha	0.073	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-037-0023 POC-1	James Town Mobile	0.071	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-037-0300 POC-1	Moxa Arch	0.073	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-041-0101 POC-1	Murphy Ridge	0.076	Wildfire Exceptional Event Demonstration August 2020

8/22/2020	Wildfire	IT	56-035-0101 POC-1	Pinedale Gaseous	0.076	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-013-0099 POC-1	South Pass	0.081	Wildfire Exceptional Event Demonstration August 2020
8/22/2020	Wildfire	IT	56-037-0200 POC-1	Wamsutter	0.077	Wildfire Exceptional Event Demonstration August 2020
8/23/2020	Wildfire	IT	56-025-0100 POC-1	Casper Gaseous	0.071	Wildfire Exceptional Event Demonstration August 2020
8/23/2020	Wildfire	IT	56-009-0010 POC-1	Converse County	0.079	Wildfire Exceptional Event Demonstration August 2020
8/23/2020	Wildfire	IT	56-013-0099 POC-1	South Pass	0.071	Wildfire Exceptional Event Demonstration August 2020
8/24/2020	Wildfire	IT	56-009-0010 POC-1	Converse County	0.071	Wildfire Exceptional Event Demonstration August 2020

<sup>1</sup> designation, classification, attainment determination, attainment date extension, or finding of SIP inadequacy leading to SIP call

## B) Exceeding Monitors Information

(listing of all monitors in the planning area that exceeded due to this Exceptional Event, regardless of operating agency, and regardless of whether or not they are impacted by other EEs)

Monitor (AQS ID and POC)	Design Value ( <u>without</u> EPA concurrence on any of the events listed in table A above) <i>3 Year Ave. Annual 4<sup>th</sup> High (ppm)</i>	Design Value ( <u>with</u> EPA concurrence on all events listed in table A above) <i>3 Year Ave. Annual 4<sup>th</sup> High (ppm)</i>
Thunder Basin (56-005-0123 – POC-1) 8/21/2020	0.060	0.059
Converse County (56-009-0010 – POC-1) 8/21/2020, 8/22/2020, 8/23/2020, 8/24/2020	0.064	0.062
South Pass (56-013-0099 – POC-1) 8/21/2020, 8/22/2020, 8/23/2020	0.065	0.064
Casper Gaseous (56-025-0100 – POC-1) 8/22/2020, 8/23/2020	0.063	0.061
Boulder (56-035-0099 – POC-1) 8/22/2020	0.070	0.069

Daniel South (56-035-0100 – POC-1) 8/22/2020	0.064	0.064
Pinedale Gaseous (56-035-0101 – POC-1) 8/22/2020	0.064	0.063
Big Piney (56-035-0700 – POC-1) 8/21/2020, 8/22/2020	0.063	0.061
James Town Mobile* (56-037-0023 – POC-1) 8/21/2020, 8/22/2020	0.049	0.048
Hiawatha (56-037-0077 – POC-1) 8/22/2020	0.061	0.061
Wamsutter (56-037-0200 – POC-1) 8/22/2020	0.060	0.059
Moxa Arch (56-037-0300 – POC-1) 8/21/2020, 8/22/2020	0.065	0.065
Murphy Ridge (56-041-0101 – POC-1) 8/21/2020, 8/22/2020	0.067	0.067

\*AQD Mobile Gaseous Stations are typically deployed for no more than 12 months and usually do not possess a complete calendar year of data.

<sup>1</sup> designation, classification, attainment determination, attainment date extension, or finding of SIP inadequacy leading to SIP call

<sup>2</sup> Provide additional information for types of event described as "other"

**C) Summary of Maximum Design Value (DV) Monitor Information (Effect of EPA Concurrence on Maximum Design Value Monitor Determination)**

**(Two highest values from Table B)**

	Design Value	Design Value Monitor	Comment
Maximum DV monitor (AQS ID and POC) <b><u>without</u> EPA concurrence</b> on any of the events listed in table A above	0.070	Boulder (56-035-0099 POC-1)	
Maximum DV monitor (AQS ID and POC) <b><u>with</u> EPA concurrence</b> on all events listed in table A above	0.069	Boulder (56-035-0099 POC-1)	
Maximum DV monitor (AQS ID and POC) <b><u>without</u> EPA concurrence</b> on any of the events listed in table A above	0.067	Murphy Ridge (56-041-0101 POC-1)	
Maximum DV monitor (AQS ID and POC) <b><u>with</u> EPA concurrence</b> on all events listed in table A above	0.067	Murphy Ridge (56-041-0101 POC-1)	

**D) List of any monitors (AQS ID and POC) within planning area with invalid design values (e.g. due to data incompleteness)**

James Town Mobile (56-037-0023 POC-1) 8/21/2020, 8/22/2020